United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	WAU000524	11 02 03	=	R	3

Remarks

21 ____ 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 20 69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Draper Valley Farms, ~~Inc.~~ KM #123
1042 Ten Mile Rd
Everson, WA 98247

Entry Time/Date	Permit Effective Date
2/3/11 12:35 pm	unpermitted
Exit Time/Date	**Permit Expiration Date**
2/3/11 1:10 pm	

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Jeff Power, Vice President/General Manager of Draper Valley Farms, Inc.
(b) (6)
(b) (6)
(b) (6)
(OPERATOR: Draper Valley Holdings LLC)

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

unpermitted

SIC 0251

NAICS 112320

Name, Address of Responsible Official/Title/Phone and Fax Number

Jeff Power, Vice President/General Manager
P.O. Box 838
1000 Jason Lane
Mount Vernon, WA 98273 (b)(6)

Contacted ☑ Yes ☐ No

RECEIVED
FEB 23 2011
U.S. EPA REGION 10
OFFICE OF COMPLIANCE AND ENFORCEMENT

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☐	Permit	☐	Self-Monitoring Program	☐	Pretreatment
☐	**Records/Reports**	☐	Compliance Schedules	☐	Pollution Prevention
☑	Facility Site Review	☐	Laboratory	☐	Storm Water
☑	Effluent/Receiving Waters	☑	Operations & Maintenance	☐	Combined Sewer Overflow
☐	Flow Measurement	☐	Sludge Handling/Disposal	☐	Sanitary Sewer Overflow

☐ MS4

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes | SEV Description

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Kristin McNeill	EPA/OCE (206) 553-6291	2/17/11
Joseph Roberto	EPA/OCE (206) 553-1669	
Signature of Management Q A Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
	EPA/OCE/IGMU (206) 553-5317	3/4/11

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

NPDES WAU000524

PCS.
2-23-2011
JH Brown

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)	O— Other Inspectors, Federal/EPA (Specify in Remarks columns)
B ---- EPA (Contractor)	P— Other Inspectors, State (Specify in Remarks columns)
E — Corps of Engineers	R — EPA Regional Inspector
J — Joint EPA/State Inspectors—EPA Lead	S — State Inspector
L ---- Local Health Department (State)	T — Joint State/EPA Inspectors—State lead
N — NEIC Inspectors	

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

NPDES
Compliance Inspection Report

Draper Valley Farm #123

Everson, Washington

February 3, 2011

Prepared by:
Kristin McNeill
Environmental Scientist
U. S. Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Inspection and Enforcement Management Unit

Table of Contents

I. Facility Information

II. Inspection Information

III. Permit Information

IV. Owner and Operator Information

V. Individuals Present

VI. Background and Activity

VII. Inspection Entry

VIII. Inspection Summary

- A. Chronology
- B. Number of Animals
- C. Length of Animal Confinement
- D. Presence of Vegetation in Confinement Areas
- E. Waste Management Process
- F. Land Application
- G. Facility Record Keeping
- H. Receiving Water

IX. Areas of Concern

Attachments:

- A. Photograph Documentation
- B. Aerial photo

Unless otherwise noted, all details in this inspection report were obtained from conversations with Jeff Power, Walter Constanza, or from observations during the inspection.

I. Facility Information

Facility Name:	Draper Valley Farm #123
Owner Name:	Draper Valley Holdings, LLC
Facility Type:	SIC 0251: Broiler, fryer, and roaster chickens NAICS 112320: Broiler and other meat–type chicken production
Facility Contacts:	Jeff Power, Vice President/General Manager Walter Constanza, Farm Supervisor/On-Site Manager David Wilson, Live Production Manager
Facility Address:	1042 Ten Mile Rd Everson, WA 98247 Whatcom County
Mailing Address:	Draper Valley Farms Corporate Offices P.O. Box 838 1000 Jason Lane Mount Vernon, WA 98273
Contact Phone Numbers:	(b) (6) (b) (6)
Contact Email:	Jeff.Power@dvfmv.com
GPS location:	Lat: +48.870318 Long: -122.432756

II. Inspection Information

Inspection Date:	February 3, 2011
Arrival Time:	12:35 pm
Departure Time:	1:10 pm
Weather Conditions:	Intermittent rain, approximately 40°F
Purpose:	Determination of compliance with the Clean Water Act.

III. Permit Information

Draper Valley Farm #123 is not currently operating under a Washington State Concentrated Animal Feeding Operation (CAFO) NPDES Permit.

IV. Owner and Operator Information

According to Jeff Power, this facility is owned by (b) (6) [redacted]. The facility is leased by Draper Valley Holdings LLC, which performs all of the day-to-day operations.

V. Individuals Present

Inspectors present throughout the inspection were Kristin McNeill and Joe Roberto, who are affiliated with the U.S. EPA Office of Compliance and Enforcement.

Facility representatives Jeff Power and Walter Constanza were both present for the inspection. They answered our questions and accompanied us throughout the entire inspection.

VI. Background and Activity

Draper Valley operates 27 fryer chicken production facilities in Washington and one in Oregon. Eighteen of the facilities are contract, in which Draper Valley owns the facility, but a contractor runs the day-to-day operations. Ten of the facilities are company operated. They are all managed in the same manner, meaning that the birds are treated the same, and the waste is managed the same and is exported to the same company. Draper Valley Farm #123 is a company-operated facility. The facility consists of six chicken barns that are 40' x 350', a compost shed, and an equipment shed. The total land area of the facility is 15 – 20 acres.

The chicks are hatched at a nearby Draper Valley hatchery and transported to the production facility on the day that they hatch. They are separated into a temperature-controlled area for the first week. On the eighth day, they are moved into an open pen. Each group of similarly-aged chickens (within the same week) are raised for 46 days. All of the birds at the facility are on a similar time rotation, so the adult birds are exported at the same time. After the birds are sent out, the top layer of litter is removed within the first 1 – 3 days. The barns are then sprayed down and disinfected, and remain empty for 14 days to allow any microorganisms to die off. The top layer of litter is replaced before new chicks arrive. This cycle of 46 days of animal confinement plus approximately 14 days for cleaning and maintenance is repeated throughout the year.

The inspection of this poultry production facility is part of EPA Region 10's Concentrated Animal Feeding Operation initiative.

VII. Inspection Entry

This was an unannounced inspection. Joe Roberto and I arrived at another Draper Valley facility (Farm #105) at 9:15 am on February 3, 2011. At that time, the owner of that facility was present and provided us with contact information for representatives from Draper Valley. Joe Roberto contacted David Wilson, a Draper Valley live production manager, at 9:20 am. David Wilson agreed to have someone from the Mount Vernon, WA, corporate office meet us. At 11:00 am, Jeff Power and Walter Constanza met us at Draper Valley Farm #105. We conducted an inspection there before continuing to Draper Valley Farm #123. This

inspection report contains information from the inspection of Farm #123. Information regarding the inspection at Farm #105 will be included in a separate report.

Joe Roberto and I presented our credentials to Jeff Power and explained the purpose of our visit at the first Draper Valley facility.

Jeff Power did not deny us access to Draper Valley Farm #123. We were allowed to inspect all areas that we wished to inspect.

VIII. Inspection Summary

A. Chronology

The bulk of the background information was gathered during our inspection at the first Draper Valley facility. Both facilities are operated in the same manner. After completing the first inspection, we followed Jeff Power and Walter Constanza to Draper Valley Farm #123. There, we interviewed Jeff Power and Walter Constanza about the operations at this facility.

After the interview we proceeded to conduct a walk-through inspection of the facility. We walked the perimeter of the operation and inspected the animal confinement areas and the compost shed.

We concluded the inspection with a closing conference with Jeff Power and Walter Constanza in which we discussed observations and areas of concern identified during the inspection. We left the facility at 1:10 pm on February 3, 2011.

B. Number of Animals

Jeff Power indicated that the facility housed approximately 90,000 fryer chickens at the time of inspection.

C. Length of Animal Confinement

According to Jeff Power, the chickens are confined throughout the year, either in barns or in an outdoor "free range" area (photo 1). The outdoor areas are approximately 25 feet wide along the length of each of the barns. After they have reached 21 days of age, chickens are allowed outside on a weather-dependent basis.

D. Presence of Vegetation in Confinement Areas

According to Walter Constanza, the barns where animals are fed and maintained have dirt floors covered in litter. Based on my observation at the time of inspection, the confinement barns were devoid of vegetation.

E. Waste Management Process

Waste generated at this facility is mainly from the chickens confined in the poultry buildings. The waste is accumulated in the poultry buildings beginning on the day that the chickens arrive at the facility and continues to accumulate until the day the birds are sent out for processing 46 days later.

After the adults are sent out, the top few inches of litter and manure is removed within the first 1 – 3 days. The manure and litter is scraped using a track loader and is loaded into trucks and transported offsite to be composted. The material is taken to High Octane, a company out of Tangent, Oregon, for composting. Generally, the bottom layers of litter have

been in the barns for 6 – 7 years, except when the barn has been converted to an organic operation. Barn 2 was being converted into an organic operation at the time of inspection, so all of the litter was being removed (photos 2 and 3).

Another source of waste at this facility is material contained in the composting shed used to compost mortalities (photo 4). This composted material is also loaded into trucks and transported to High Octane.

According to Jeff Power, all the waste generated at this facility is exported offsite.

F. Land Application
No land application of chicken manure takes place at this facility.

G. Facility Record Keeping
The facility maintains records of the shipments of waste exported for compost.

H. Receiving Water
The nearest surface water is two ditches that flow between barns 4 and 5. Along the western side of the facility property, the southern ditch is routed to combine with the northern ditch (attachment B). According to Google Earth Pro aerial images, approximately 8 miles downstream, this ditch (which becomes a creek) flows into the Nooksack River. At the time of inspection, water in the northern ditch did not appear to be flowing.

I did not see wastewater from this facility entering waters of the United States at the time of inspection.

IX. Areas of Concern

We conducted a walk-through inspection of the facility, including the confinement areas and waste handling system. Observations during the inspection included the identification of two areas of concern. These areas of concern are described as follows:

A. Potential for discharge
At the time of inspection, litter was being removed from barn 2 through the western entrance. The removal process involved using a track loader to load litter onto a conveyor belt that moved the litter into a truck for export. As a result of this process, litter was present on the ground beneath the conveyor belt (photo 2). The ground in front of barn 2 is slightly sloped toward the southern ditch, which is approximately 100 yards away (attachment B). There appeared to be a potential for stormwater to carry the litter in front of barn 2 into the southern ditch.

B. Potential for discharge
Litter was evident outside of the western entrance of barn 5. The ground in front of barn 5 significantly sloped down to the northern ditch, which is approximately 50 yards away. There appeared to be a potential for stormwater to carry the litter down the access road and into the northern ditch, which eventually flows into the Nooksack River (photos 5 – 7, attachment B).

Report Completion Date: 3/3/11

Lead Inspector Signature: _____

Kristin McNeill
(206) 553-6291

Attachment A: Photograph Documentation

(All photos taken by K. McNeill using a Samsung i85 camera on February 3, 2011)

Photo 1. Free range area along the north side of barn 2.

Photo 2. Conveyor belt used to move litter from barn 2 into a truck for export.

Photo 3. Conveyor belt used to remove litter from barn 2.

Photo 4. Compost shed on the north side of barn 4.

Photo 5. Litter track out outside of barn 5.

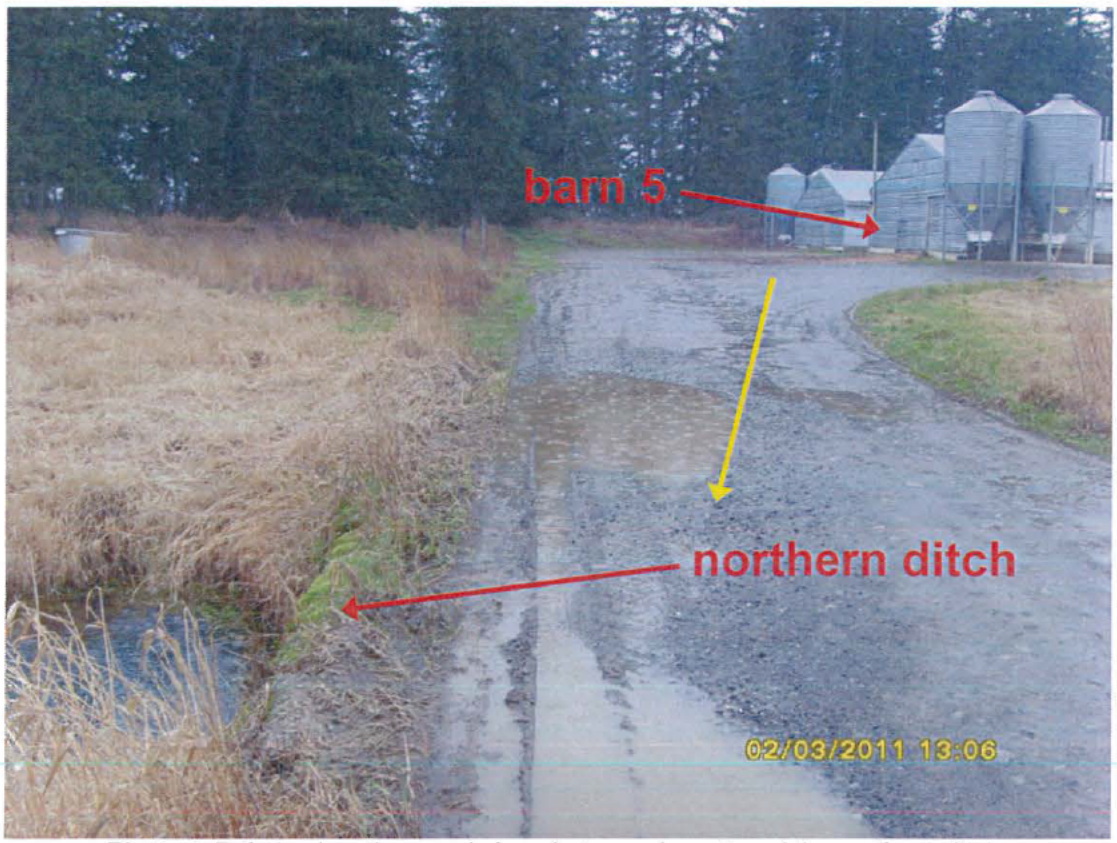

Photo 6. Relative locations and slope between barn 5 and the northern ditch.
Red arrows indicate locations and yellow arrow indicates direction of flow.

Photo 7. Northern ditch that flows to the west from the facility. At the time of inspection, the water in the ditch did not appear to be flowing.

Attachment B: Aerial photo
(image from Google Earth Pro)